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February 19, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: WT Docket No. 12-69

Dear Madam Secretary:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R., this correspondence constitutes notice of a permissible ex parte presentation in the captioned proceeding.

The meeting transpired on February 14, 2013. T. Clark Akers and the undersigned, both representing Continuum 700, LLC, met with David Goldman, Esq. of Commissioner Rosenworcel's office.

At the meeting, the arguments set forth below were presented.

Continuum explained that the management team of Continuum has built and operated a substantial number of wireless cell sites over the past decades, and would look forward to building 700 MHz facilities in the event that interoperability would return to 700 MHz. Without it, a lack of roaming capability and realistic and practical access to cost-effective equipment makes build out not practically feasible. Thus, the Commission should proceed with an interoperability ruling with the understanding that, given a fair and level playing field, a Greenfield applicant such as Continuum can enter the market. Continuum also noted that the petition for interoperability that led to the opening of the referenced docket is now almost three and one-half years old, and a near-term decision on this issue is necessary if there is to be any hope of competition.

Please direct any questions to the undersigned counsel for Continuum 700, LLC.

Very truly yours,

/s/ Thomas Gutierrez  
Counsel for Continuum 700, LLC

Enclosure

cc: David Goldman, Esq.